

3. A "Dropper" referred to an individual able to securely receive and then forward goods obtained via carding or other types of fraud, or convert those goods to currency to then be forwarded to others. Droppers were compensated either in cash or through a one-to-one arrangement in which the Carder must ship two carded items to the Dropper in return for the Dropper sending one of the items on to the Carder.

4. A credit card or debit card was programmed with a magnetic strip on the back of the card with the account holder's account number, name, and the expiration date for the account and authorizes the person named on the credit card to make charges for which they will be billed periodically by the card issuer. For purposes of this indictment, credit cards were issued and serviced by the financial institutions noted below in Paragraphs 8 and 10 of this Indictment.

5. A debit card looked like and contained the same information as a credit card, but withdrew the money immediately from the card holder's affiliated bank account.

6. "Fullz" was a term used by carders to refer to a complete set of information on a prospective fraud victim. Fullz typically included the victim's full name and billing address; credit card number, expiration date and card security code; as well as their Social Security number and birth date.

7. "Dumps" were unauthorized digital copies of the information contained in the magnetic strip of an active credit card, such as the card number and expiration date. Dumps could be used to create a fake credit card to make purchases.

8. Key Bank was a financial institution, within the meaning of Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), and was located within the Northern District of Ohio.

9. Directions Credit Union was a financial institution, within the meaning of Title 18, United States Code, Section 20, whose deposits were insured by the National Credit Union Administration (NCUA), and was located within the Northern District of Ohio.

10. Capital One Bank, Citibank, J.P. Morgan Chase Bank, Fifth Third Bank, First Merit Bank, Huntington National Bank, UMB Bank and WoodForest Bank were financial institutions, within the meaning of Title 18, United States Code, Section 20, whose deposits were insured by the FDIC.

11. PayPal, Inc. (PayPal) was an online payment company headquartered in San Jose, California. PayPal operated an online payment system, which allowed customers to make online money transfers to merchants and other individuals. PayPal customers could conduct a variety of online financial transactions, including sending and receiving electronic payments, conducting online money transfers and making electronic deposits to bank accounts linked to PayPal accounts.

12. In order to set up a PayPal account, a customer was required to access the PayPal website and electronically submit various items of personal information such as name, an email address, phone number, and bank account information to be linked to the PayPal account. Customers could link their PayPal account to bank accounts at banks that were federally insured.

13. Defendant BLESSING ADELEKE, aka BLESSING RAYMOND, aka PURI JOHANNES, aka DetectedBits, aka DetecteD, aka D, was a national of Nigeria. ADELEKE was an administrator of the Shad0w.info carding forum and was a carder.

14. Defendant KYLIE ANN HARLOW was a citizen of the United States of America and resided in New York and Pennsylvania. HARLOW was a dropper working in conjunction with ADELEKE.

15. Co-Conspirator 1 (CC1) was an individual residing in Glendale, West Virginia.

16. Co-Conspirator 2 (CC2) was an individual residing in the Netherlands.

17. Co-Conspirator 3 (CC3) was an individual known to the Grand Jury.

18. Co-Conspirator 4, 5, 6, 7, 8, 9, 10, and 11 (CC4, CC5, CC, CC7, CC8, CC9, CC10, CC11) were droppers working in conjunction with ADELEKE and HARLOW.

19. Shad0w.info was an online marketplace where vendors of compromised data – such as credit card numbers, online accounts, or personally identifiable information (PII) – sold that compromised data to buyers to use for financial gain.

20. Some of the items listed for sale in Shad0w.info included user accounts at Amazon, eBay, Match.com, PayPal, email/password combinations from accounts from the United States and United Kingdom, credit cards including American Express, MasterCard, and Visa.

21. Shad0w.info forum also listed for sale the credit card information for individual victims with addresses in the Northern District of Ohio, Eastern Division, including addresses in Painesville, Mayfield Heights, and Lakewood, Ohio.

#### THE SCHEME TO DEFRAUD

22. From in or around January 2014 through October 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, ADELEKE, HARLOW, and others known and unknown to the Grand Jury, devised and intended to devise a scheme to defraud and stole money and property from unsuspecting victims and their financial institutions located in the United States through the use of the Shad0w.info forum (the "Scheme").

#### STATUTORY ALLEGATIONS

23. From in or around January 2014 and continuing through in or around October 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, ADELEKE, HARLOW, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1349, to wit, to knowingly and willfully devise and execute, and attempt to execute, a scheme and artifice to defraud a financial institution, as defined in Title 18, United States Code, Section 20, and to obtain moneys and funds under the custody and control of financial institutions by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

**Objects of the Conspiracy**

24. The objects of the conspiracy included:
- a. Using interstate and foreign wire transmissions to obtain credit card and debit card numbers of victims without their authorization or consent;
  - b. Using the captured credit and debit card numbers to make fraudulent and unauthorized purchases of retail goods and gift cards, which were funded by and derived primarily from banks (located in the Northern District of Ohio and elsewhere) that had originally issued the stolen credit and debit card numbers;
  - c. Returning some of those unauthorized purchases to banks and retail stores to obtain cash;
  - d. Stealing funds from victims' bank accounts; and
  - e. Forwarding criminal proceeds, including retail goods and gift cards acquired through the use of stolen credit and debit cards, to foreign recipients for their personal benefit and enrichment.

**Manner and Means of the Conspiracy**

It was part of the conspiracy that:

25. ADELEKE, CC1 and CC2 served as administrators of the Shad0w.Info forum.
26. The Defendants and others known and unknown to the Grand Jury used the Shad0w.info forum to find and trade stolen credit card information.
27. After the Defendants obtained stolen credit card information, they harvested credit card numbers, Bank Identification Numbers ("BINs"), and any other data possible, including names of the account holders or PIN numbers for the credit cards.

28. The Defendants then used the stolen card information to purchase items for themselves, including retail goods and gift cards.

29. ADELEKE shared this credit card information with others, including HARLOW, on the Internet through ICQ, FaceBook Messenger, email, and other social media applications.

30. ADELEKE communicated with HARLOW and other co-conspirators over ICQ, FaceBook Messenger, email and other social media applications about obtaining and using unauthorized credit cards to purchase items and gift cards.

31. The Defendants then shipped retail goods and gift cards purchased with stolen card information to droppers, including HARLOW and CC4.

32. In some cases, HARLOW and CC4 converted the retail goods and gift cards to cash by returning them to retail stores for cash.

33. In some cases, HARLOW and CC4 would forward the retail goods to another dropper provided by ADELEKE.

34. The Defendants eventually forwarded the retail goods, gift cards and currency, either by shipping or through electronic funds transfers, to members of the conspiracy for their personal enrichment.

**Acts in Furtherance**

35. In furtherance of the conspiracy, and to effect the objects thereof, the Defendants and others known and unknown to the Grand Jury committed the following acts, among others, in the Northern District of Ohio and elsewhere.

36. On or about April 1, 2015, HARLOW and CC4 had the following conversation:

HARLOW	Okay :) I'm shopping lol D told me to
CC4	Perrrrfect lol D definitely loves you
HARLOW	Hmm asking for a new card since this one isn't working
CC4	Not yet. Can't find that damn check
HARLOW	Waiting on D

CC4	Wonder if I could pay my labtop with a card like that
HARLOW	What card?
CC4	With any card
HARLOW	I think they might catch you on that
HARLOW	Cause they can track you on that one BUT don't worry. I'll give you enough for two payments. Then we will get you enough to pat it all off okay?
HARLOW	[screenshot showing an approximately \$1,300 deposit into a bank account]
CC4	Holy shit
HARLOW	What?
CC4	I didn't know if it would work but looks like it did
HARLOW	Gonna need to get a notebook for you, a few downloaded things. I'm gonna teach you how to do it :) so you will never have to worry bout paying anything
CC4	I'm so excited :)

37. On or about April 2, 2015 and continuing to April 3, 2015, HARLOW sent the following messages to CC4:

HARLOW	D figured out something bad ass. Text me
HARLOW	Lol D wants me to wait till the first goes through then do another one :) but our cart is ready and then I have another card lol

38. On or about April 30, 2015, ADELEKE advertised the following on his FaceBook page:

Good news guys!! join the best shops now and enjoy purchasing your rdp/cc/cpanel/shell and alot of stuff!! <http://shad0w.info/> note we are new and we are still adding more accounts to shop

39. On or about May 14, 2015, HARLOW and CC4 had the following conversation:

HARLOW	Soooo we need to find a place to sell a watch
HARLOW	[Picture of a Movado wristwatch]
CC4	Holy tits! Where did you get that
HARLOW	Got it in the mail today. Its worth \$600. Have to sell it to send out D's inverters

40. On or about May 20, 2015, HARLOW sent CC4 messages stating, "Iphone getting sent to you as well. It got canceled cause I told D to but it didnt work cause I just checked it. It [w]ill probably be there when your dad takes you to leave so have wayne look for it. I'm



chewing D a new asshole. Telling him to kill your address on sending shit. Good thing is you can keep the \$\$ you get for it.”

41. On or about May 20, 2015, HARLOW and CC4 engaged in the following conversation concerning a laptop that ADELEKE had sent them:

CC4	Thought you were paw[n]ing the la[p] top?
HARLOW	No point. Need the laptop to do the pop money
CC4	Then how are we gonna get money for the logs? D said he'd send you another one
HARLOW	I got the password for D's VIP72 so that when we are ready we can just do it quick. Also I can help you set your Pop money accounts
HARLOW	You need a main one and also a few bogus ones, that go to prepaid cards. Make some bogus names and have those linked
CC4	And D is tweaking
CC4	Lol tell D we need cards!
HARLOW	Also D sending us checks
HARLOW	Duh. I got to run a few wus for D so we have to do that too

42. On or about June 8, 2015, ADELEKE issued and caused to be issued unauthorized checks from the Key Bank account of W.C.M., a resident of Pepper Pike, Ohio, to the following co-conspirators, each check being a separate act in furtherance of the conspiracy:

	To	Amount
a.	HARLOW	\$1,000
b.	HARLOW	\$1,300
c.	CC4	\$1,300
d.	CC4	\$1,100
e.	CC5	\$1,100
f.	CC5	\$1,300
g.	CC6	\$1,240
h.	CC6	\$1,040
i.	CC7	\$1,300
j.	CC7	\$1,100
k.	CC8	\$1,300
l.	CC9	\$1,300
m.	CC9	\$1,100
n.	CC10	\$1,300
o.	CC11	\$1,100
p.	CC11	\$1,300



43. On or about June 11, 2015, HARLOW and CC4 had the following conversation:

CC4	What's carding mean? Lol D was asking me if I knew how
HARLOW	Lol like using ppl cards on wish.com and shit
HARLOW	That's carding
CC4	Eeeee I'm so excited lol
HARLOW	Just make sure you use all their info, make your name different and send it to your address
CC4	He gave me the info
CC4	United States [Personal information of A.S. in New York, NY]

44. On or about June 18, 2015, ADELEKE and HARLOW engaged in the following conversation:

ADELEKE	take picture of the check left on ur name
ADELEKE	take the picture and write my name on a small piece of papper then put it at the side
HARLOW	Okay
ADELEKE	now
HARLOW	Okay! Hold on!
ADELEKE	so the other one u spent all the money ?
HARLOW	Already said I did. Carley and I both went today to cash those and send them out. They were declined
HARLOW	I've been trying since you told me to send it out
HARLOW	Now I know why it didn't work
HARLOW	And yes [Western Union] did tell me about the fraud in Ghana too

During the above conversation, HARLOW sent ADELEKE a picture of a Key Bank check from the account of W.C.M. for approximately \$1,000 next to a written note with the word "DetectedD" on it.

45. On or about June 19, 2015, ADELEKE made the following comment on FaceBook:

To all Shad0w.info members. Good News New fresh high balance GOLD CCV added to shop now!!and CC fullz Plus strong cpanel,shell,and all type of accounts like amazon, walmart, apple, ebay, aliexpress, craigslist, discover, match.com, eharmony, fedex, ups and many more. and gold dumps!! visit <http://shad0w.info/> now to find out more for yourself. All classic stuff and 1000% valid. We hope enjoy our service.

46. On or about June 23, 2015, ADELEKE advertised the following on his FaceBook page:

I want to introduce a new best shopping outlet service - <http://shad0w.info> The owners are in the market for some years. the accounts and stuff has been established a reputation as high-qualified and we're following the admissible pricing policy.

They respect and hold there customers in high respect.

**Peculiarities of our service:**

- High-percent valid.
- Many Differnt Accounts
- Daily updates.
- Highest Quality Ever Seen
  
- We're not resellers of somebody else's - that's why all stuff sold to you will stay only with you.
  
- Positioning to outgrow any other shop on the market, will always looking for new good sellers to join our team

**Account List That Are In Shop:**

- Alibaba
- AliExpress
- Amazon
- Apple
- Choice Hotels
- Craiglist
- Dell
- Discover Account
- eBay
- eHarmony
- FedEx
- Hacked Emails (will be replaced for British Airline Accounts)
- Macys
- Marriott
- Match
- Newegg
- Paypal
- Target
- Turbo Tax
- Uber
- UPS
- Walmart

**Creditcards:**

- Visa
- Mastercard
- Amex
- Discover

**Fullz:**

We got fresh fullz and we are testing this to see if peoples are in need of them otherwise we t[h]row them out if we dont get sales on this ofcourse.

**Dumps**

We got fresh skimmed Dumps and we are testing this to see if peoples are in need of them otherwise we t[h]row them out if we dont get sales on this of course.

47. On or about June 23, 2015, ADELEKE advertised the following on his FaceBook page:

Message me now if you are from ABH or any forum like big russian forums etc, got a job for you :) thanks admin of shad0w.info.

48. On or about August 14, 2015, ADELEKE and HARLOW had the following conversation:

HARLOW	What's up bae
ADELEKE	how much u did ?
HARLOW	The one that went through?
ADELEKE	yes
HARLOW	330 I think
ADELEKE	same thing as mine ?
ADELEKE	i mean how much u did on urs
ADELEKE	what the name of the cc that work for u ?
ADELEKE	i want to check the bin
HARLOW	Oh! Hold on I have to go back through
HARLOW	[XXXXXX]
ADELEKE	steakhouse gift card can be exchange ?
ADELEKE	hey
HARLOW	Yes. Look at coinstar kiosk website
ADELEKE	so means if i get steakhouse gift card u can exchange them to cash as well ?

ADELEKE	have u went to exchange the gf to cash ?
HARLOW	Yes. Not yet still waiting
HARLOW	I would need the actual card though
ADELEKE	Okay i got another 200\$ new ready
ADELEKE	how much was the one i did yesterday ?
ADELEKE	i did 330 yesterday and i have another 200 means 530 :)

49. On or about August 15, 2015, ADELEKE and HARLOW had the following conversation:

ADELEKE	how was it ?
HARLOW	Trying now
ADELEKE	okay make it works :P
HARLOW	Lol did you get more?
ADELEKE	i stop only have 200\$ more
ADELEKE	so my total is like 530
HARLOW	Yeah. Remember they take a percentage
ADELEKE	I know
ADELEKE	hey
HARLOW	No luck. I'm still tryint
ADELEKE	what still the issue ?
HARLOW	Idk. I've called like twice but nothing. I have a new idea though
ADELEKE	what the new idea?
ADELEKE	so we not gonna be able to cash this ?
HARLOW	Take the giftcats and buy something for that price. Then go return it. No percent taken out
HARLOW	Still untraceable
ADELEKE	u will have to do that online ?
HARLOW	Yes and no. I can buy it at the store with the egift card or online and pick it up
ADELEKE	Okay try with us but that gonna take long time
ADELEKE	not gonna be fast :(
ADELEKE	so when u return it they give u the cash ?
HARLOW	No. If I get the egift cards at night I can do it and have it done that day
HARLOW	Yes I do believe so
ADELEKE	Oh you want to use the gift card to get physical egift card and do store pick up and exchange that for cash ?
ADELEKE	ok do it now with urs first and tomorrow tell me how it goes.
HARLOW	Okay hun

50. On or about August 17, 2015, ADELEKE and HARLOW had the following conversation:

ADELEKE	i just card 6 itunes 25 gift card with the 200 walmart gc i had
HARLOW	Sorry was on the phone
HARLOW	They said the order was cancelled so they cancelled the gc
ADELEKE	how come mine was not cancelled?
ADELEKE	and why is it only mine that was cancelled?
HARLOW	No no, the 330 one or whatever
HARLOW	Idk. Maybe the cc owner called? Idk bae all I did was call and ask
ADELEKE	this is first time this kind of thing happening to me since i have been into carding for long
ADELEKE	but it's cool
HARLOW	I had to pretend I was that girl, emy or something. They asked if I wanted to make another order and I said no
HARLOW	Give me an email to send those gcs

51. On or about August 22, 2015, ADELEKE sent a FaceBook message to CC3 stating, "I do spam for bank logins and i do bank transfer as well."

52. On or about August 22, 2015, ADELEKE and HARLOW had the following conversation:

ADELEKE	Am sending two laptops to your address and would need you to reship it to someone in USA
HARLOW	Okay
ADELEKE	Can you do that or not ?
HARLOW	Yeah probably

53. Later that same day, ADELEKE and HARLOW continued the above conversation as follows:

ADELEKE	Guess I can now ship over 40 laptops to ur address lol
ADELEKE	Already shipped 4 will arrive on Tuesdays
ADELEKE	Tuesday
ADELEKE	If you handle the shipment we will ride a good horse
ADELEKE	I will card more then you sell it
ADELEKE	But want ya to ship some down to my local drop before I can start so that I can trust u
HARLOW	The fact that you think you can't trust me is degrading but okay. I'm going to have to card some walmart gfc's so I have some caah
HARLOW	Cash**
HARLOW	Cash to atleast send them out
ADELEKE	Am not downgrading you! I know u can't mess with me but remember u never work on any shipment for me! More reason why I think u can't do it

	so you need to confuse me on that side! Beside when the 4 arrives you can sell 1 to have the rest shipped
HARLOW	What kind of laptops are they ?
ADELEKE	dell laptops
HARLOW	How much each?
ADELEKE	all over 600\$
HARLOW	Ok hun

54. On or about August 23, 2015, ADELEKE sent a FaceBook message to CC3, containing login credentials to a Chase bank account for E.C., a resident of The Bronx, New York.

55. On or about August 24, 2015, ADELEKE sent a FaceBook message to CC3 containing bank credentials and personal identifying information for the Kiwanis Club of Vashon Island, Vashon, Washington, and D.R.K. a resident of St. Augustine, Florida.

56. On or about August 24, 2015, ADELEKE told HARLOW that he was “trying to make 50K from carding” so he was going to send her “over 50” laptops. HARLOW responded, “well make sure I will be home. I didn't know you were carding these or else I would've stayed home.”

57. On or about August 24, 2015, HARLOW received at her residence in Pennsylvania four Dell computers purchased by ADELEKE.

58. On or about August 25, 2015, HARLOW and ADELEKE had the following conversation concerning the Dell computers:

ADELEKE	Do you have box to pack it yet ?
ADELEKE	Wanted to give u cc before
ADELEKE	Since ya said ya want to do Carding tonight
ADELEKE	Guess it would be tomorrow night then
HARLOW	Yes I got a big box. Will pack it in the morning. And that's fine. I can wait till tmm. Plan on really big carding next couple daya
HARLOW	Days

59. On or about August 28, 2015, ADELEKE sent a FaceBook message to CC3, containing bank credentials and personal identifying information for S.A.V. a resident of San Bernadino, California.

60. On or about August 25, 2015, HARLOW and ADELEKE had the following conversation:

ADELEKE	u have boa drop ?
HARLOW	Nope
HARLOW	Did you get new cc?
ADELEKE	We have cc but we need to pass them through checker. my partner is sick. he is at hospital
ADELEKE	so we waiting for him

61. On or about August 31, 2015, ADELEKE and HARLOW had the following conversation:

ADELEKE	i will send a cc to ur icq
ADELEKE	it live u can try
ADELEKE	or should i send here?
HARLOW	Send to my icq. I need to make some \$\$ tonight for [HARLOW's relative]

62. On or about September 29, 2015, HARLOW and CC4 had the following conversation:

HARLOW	I figured how to sol[ve] your problems
HARLOW	Easy and quick
CC4	How



HARLOW	Paypal. Did it myself last night. Made 350 in an hr
HARLOW	Exactly. All I need you to do it make a new one. Also sign up for Google wallet and request the card
CC4	Alright
HARLOW	Helping me get our bakery up. I've been working on this PayPal thing for a while and I wanted to surprise you with it. Today I just actually tried my idea out and it works flawlessly
HARLOW	I know the beginning and I know that you're kind of skeptical but if all works out this will take care of us until we open our business
CC4	That would be Fuckin awesome!!
HARLOW	Agreed!! From what I know our limit for a day would be 3500 and with Google Wallet we can instantly cash it out so no more waiting no more freezing of the account it would be ours that day
HARLOW	I've done a lot of research in this because I know that you need it as do I and I am extremely happy that it worked at today

63. On or about October 13, 2015, ADELEKE, using a Facebook account under the name "Puri Johannes," sent a message to CC3 containing bank credentials and personal identifying information for L.C.S., a resident of Los Angeles, California.

64. On or about October 15, 2015, ADELEKE, using a Facebook account under the name "Puri Johannes," sent a message to CC3 containing bank credentials and personal identifying information for T.S., a resident of Sheffield Lake, Ohio.

65. On or about November 2, 2015, ADELEKE, using a Facebook account under the name "Puri Johannes," sent a message to CC3 containing bank credentials and personal identifying information for B.P., a resident of Sylvania, Ohio.

66. From on or about May 13, 2015 through at least October 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendants did offer for sale stolen and unauthorized PayPal credentials linked to credit card and bank accounts that were issued by financial institutions located in and to individuals in the Northern District of Ohio, as listed below, for the purpose of subsequently using the credit card and bank account numbers to conduct fraudulent and unauthorized transactions:

	<b><u>Victim and location</u></b>	<b><u>Financial Institution</u></b>	<b><u>Account Ending in</u></b>
a.	M.N. North Royalton, OH	Citibank	X-4955
b.	M.N. North Royalton, OH	UMB Bank	X-8215
c.	T.M. North Ridgeville, OH	Huntington National Bank	X-5343
d.	T.M. North Ridgeville, OH	J.P. Morgan Chase	X-7003
e.	T.M. North Ridgeville, OH	Key Bank	X-7931
f.	K.N. Avon, OH	J.P. Morgan Chase	X-2752
g.	K.N. Avon, OH	J.P. Morgan Chase	X-6432
h.	M.C. Lakewood, OH	J.P. Morgan Chase	X-1466
i.	K.R. Parma, OH	Fifth Third Bank	X-2330
j.	K.R. Parma, OH	Fifth Third Bank	X-4844
k.	K.R. Parma, OH	Capital One Bank	X-9603
l.	K.A. Denver, CO	Key Bank	X-8398
m.	L.M. Medina, OH	First Merit Bank	X-2844
n.	L.M. Medina, OH	First Merit Bank	X-2128
o.	J.J. McClure, OH	WoodForest National Bank	X-3448

All in violation of Title 18, United States Code, Section 1349.

**COUNTS 2 – 17**  
(Bank Fraud, 18 U.S.C. § 1344)

The Grand Jury further charges:

67. The factual allegations of Paragraphs 1 – 22 and 36 – 66 of this Indictment are hereby repeated, re-alleged and incorporated by reference as if fully set forth here.

68. From in or around January 2014 and continuing through in or around October 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants BLESSING ADELEKE, aka BLESSING RAYMOND, aka PURI JOHANNES, aka DetectedBits, aka DetectedD, aka D, KYLIE ANN HARLOW, and others presently known and unknown to the Grand Jury having devised and intended to devise a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20 and as listed below, and to obtain monies and funds in the custody and control of the below financial institutions by means of material false and fraudulent pretenses, representations and promises, namely, the scheme and artifice described above in Paragraphs 22, 25 – 34 and 36 – 66 of this Indictment, well knowing at the time that the pretenses, representations and promises would be and were false and fraudulent when made, did knowingly execute and attempt to execute the foregoing scheme and artifice by gaining access to W.C.M.'s online bank account and causing, and attempting to cause, the transfer of funds described below with each access, transfer and attempted transfer being a separate count as set forth below:

<b><u>Count</u></b>	<b><u>Approximate Date</u></b>	<b><u>Financial Institution</u></b>	<b><u>Description</u></b>
2	June 8, 2015	KeyBank	\$1,000 check issued to HARLOW
3	June 8, 2015	KeyBank	\$1,300 check issued to HARLOW
4	June 8, 2015	KeyBank	\$1,300 check issued to CC4
5	June 8, 2015	KeyBank	\$1,100 check issued to CC4
6	June 8, 2015	KeyBank	\$1,100 check issued to CC5
7	June 8, 2015	KeyBank	\$1,300 check issued to CC5
8	June 8, 2015	KeyBank	\$1,240 check issued to CC6
9	June 8, 2015	KeyBank	\$1,040 check issued to CC6

10	June 8, 2015	KeyBank	\$1,300 check issued to CC7
11	June 8, 2015	KeyBank	\$1,100 check issued to CC7
12	June 8, 2015	KeyBank	\$1,300 check issued to CC8
13	June 8, 2015	KeyBank	\$1,300 check issued to CC9
14	June 8, 2015	KeyBank	\$1,100 check issued to CC9
15	June 8, 2015	KeyBank	\$1,300 check issued to CC10
16	June 8, 2015	KeyBank	\$1,100 check issued to CC11
17	June 8, 2015	KeyBank	\$1,300 check issued to CC11

All in violation of Title 18, United States Code, Sections 1344 and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.